



June 18, 2021

Matt Lombardo
MVP Health Insurance Company
625 State Street
Schenectady, NY 12305

Re: MVP Health Plan, Inc.
2022 Vermont Exchange Rate Filings – Individual and Small Group
SERFF Tracking #: MVPH-132824950, MVPH-132824927
Objection #6

Dear Mr. Lombardo:

On behalf of the Vermont Green Mountain Care Board and the Vermont Health Care Advocate, the following additional information is required for this filing.

Notice regarding proper responses:

- A minimum-acceptable response to quantitative questions from us must include a spreadsheet calculation with retained formulas such that we can replicate the calculations therein.
- Explanatory responses are merely a supplement to the spreadsheet material and in of themselves will constitute a lack of response.

Questions:

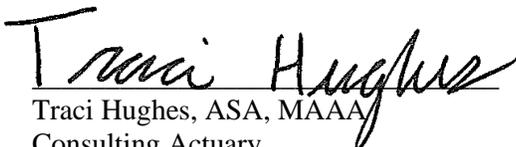
1. Please provide the projected cost sharing reduction (CSR) recoveries imbedded in MVPHP's 2021 individual and small group (VHC) filing and its actual recoveries to date. Explain whether MVPHP expects actual recoveries in 2021 to deviate from the projection and, if so, by how much.
2. In a format similar to the table on page 4 of MVPHP's actuarial memorandums for the 2022 VHC filings, please provide two tables – one relating to the individual market and one relating to the small group market – that show incurred and paid claim amounts and IBNR factors for each month of 2020 and 2021 to date. If total member months by month and incurred claims PMPMs by month for 2019, 2020, and 2021 to date are included in the documents MVPHP has already submitted in connection with the filing, please specify where they can be found. Otherwise, please provide these data.
3. Explain how the proposed 2022 individual and small group rates would be impacted if MVPHP had used 2020 as the experience period instead of 2019.
4. Please provide MVPHP's cost per dose for COVID-19 vaccines. If costs vary by provider, please provide a weighted average.

5. Does MVPHP's data support a 1% annual utilization trend for 2022? If so, please submit such data. If not, please explain what if any annual utilization trend MVPHP's data supports and provide the corresponding data.
6. What were MVPHP's actual allowed prescription trend and actual paid prescription trend net of Rx rebates for the experience period 1/1/20-12/31/20 for the VHC plans? Please submit data showing why both trend numbers are so much higher in MVPHP's 2022 VHC Filing than they were in MVP's 2021 VHC Filing.
7. Provide support for the \$3.35 PMPM difference between the \$34.75 administrative load MVPHP used in its 2021 VHC filing and the \$47.10 administrative load MVPHP is using in its 2022 filings. If MVPHP had used the same \$43.75 administrative load in its 2022 filings as it used in its 2021 filing, how would MVPHP's filings be impacted? Please provide both a percentage rate impact and a total dollar impact.
8. Has MVPHP evaluated its pharmacy partner recently? If so, when? If not, does it plan to? Does MVP have any internal analysis on opportunities for more pharmacy rebates or lower costs?

To ensure that the review of your filing is completed before statutory deadlines, we expect you to respond as expeditiously as possible, but no later than June 25, 2021.

We trust that you understand these forms may not be used in Vermont until they are formally approved by the GMCB.

Sincerely,



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